



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 6, 2024

By ECF and Email

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: *No More Deaths v. U.S. Customs and Border Protection*, No. 21 Civ. 954 (JPC)

Dear Judge Cronan:

This Office represents Defendant United States Customs and Border Protection (“CBP”) in the above-referenced Freedom of Information Act (“FOIA”) action. I write on behalf of all parties to update the Court on the status of this FOIA case pursuant to the Court’s January 26, 2024 Order (Dkt. No. 58).

Since the parties’ last update, CBP has now completed its production in this case. CBP has produced roughly 6,900 pages in full or in part, marked roughly 50 pages publicly available, and withheld roughly 40 pages in full.

Plaintiff’s counsel is currently on parental leave until mid-July, at which point undersigned counsel expects to be on parental leave until mid-August. Accordingly, the parties respectfully request a 60-day extension for the next status letter from June 28, 2024, to August 27, 2024.

The parties thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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